

Aguirre, Mary H. (USANM) 1

From: Neda, Tara (USANM)
Sent: Thursday, March 12, 2015 2:21 PM
To: Aguirre, Mary H. (USANM) 1; K'Aun_Wild@nmcourt.fed.us
Cc: 'brian_pori@fd.org' (brian_pori@fd.org); todd@toddhotchisslaw.com
Subject: RE: U.S. v. Gonzales, Archuleta, 14cr922 JB

Everyone: after reading this email, I realize that I provided the wrong exhibit numbering – it should be 1(a) through (d) and 2(a) and (b); and 3

From: Aguirre, Mary H. (USANM) 1
Sent: Thursday, March 12, 2015 2:19 PM
To: K'Aun_Wild@nmcourt.fed.us
Cc: 'brian_pori@fd.org' (brian_pori@fd.org); todd@toddhotchisslaw.com
Subject: U.S. v. Gonzales, Archuleta, 14cr922 JB

Hello, K'Aun: attached are the sworn statements of the agents and their attached spreadsheets [exhibits 1(a) and (b) and 2(a), (b), (c) and (d)]. Also, the hard disc containing all the raw data of each transaction, Exhibit 3, will be delivered via today's court run because it contains too much data to be emailed.

Brian and Todd: You can pick up your copy of the disc (Exhibit 3) at the desk on the 9th floor.

Tara C. Neda, AUSA
(505) 224-1475
tara.neda@usdoj.gov

<< File: Ex 1a Dotson - Affidavit for Gonzales.pdf >> << File: Ex 1b 3-11-15 Copy of CO UI claims.pdf >> << File: Ex 1c 3-11-15 Copy of NM UI claims.pdf >> << File: Ex 1d 3-11-15 Copy of TX UI claims_Redacted.pdf >> << File: Ex 2a Brown - Affidavit for Archuleta.pdf >> << File: Ex 2b 3-11-15 Copy of Archuleta loss spreadsheet.pdf >>

Affidavit

U.S. Department of Labor
Office of Inspector General

City: Dallas

Date: March 11, 2015

State: Texas

Time: 10:43 am

**USA v. Jasonn Gonzales and Gerald Archuleta
District of New Mexico
Criminal No. 14-cr-922JB**

Heather Dotson, Special Agent, being duly sworn, deposes and states:

1. On or about June 24, 2013, I prepared the attached spreadsheet documenting the actual and intended loss amounts for which defendant Jasonn Gonzales is held accountable.
2. These figures were compiled from source data including the New Mexico Department of Workforce Solutions, the Texas Workforce Commission, the Colorado Department of Labor and Employment, JP Morgan Chase, Wells Fargo and Bank of America.
3. I reviewed the above listed agency and bank records and to the best of my knowledge the actual and intended loss figures are correct. The actual loss for Jasonn Gonzales is at least \$804,735.73¹. The actual loss is based on monetary payments from each of the three states and monies withdrawn from the debit cards that were issued by each of the three states.

Case Number: 14-cr-922JB Page 1 of 2 Deponent's Initials HPD

OIG 118A

¹ Colorado Department of Labor and Employment underreported the loss amount for McReynolds Consulting employee Philip Gomez by \$15,120 and for West Colorado Textile employee Ronnie Flores by \$1,846. This would adjust the actual loss amount for Jasonn Gonzales to \$821,701.73.



Statement of Heather Dotson

Date: March 11, 2015

[A large diagonal line is drawn across the page, with the handwritten word "NONE" written across it.]

I have read this statement consisting of 2 pages. I have been given an opportunity to make corrections. This statement is true and correct to the best of my knowledge.

Heather Dotson
Deponent's Signature

Subscribed and sworn before (Inspector General Act of 1978, 5 U.S.C., App. 3):

David Wickersham
Special Agent

Date: 3/11/15

Case Number: 14-cr-922JB

OIG 118C

FICTITIOUS UI CLAIMS FILED IN COLORADO**Employer/Mailing Address:** Brent Liberda DBA West Colorado Textile, PO Box 18472, Denver, CO 80218

Christina Cardenas applied for PO Box 18472 on 07/12/11

Reported Physical Location & Phone: 7356 W. Alameda Ave., Lakewood, CO 80246, 303-520-3520

7356 W. Alameda Ave. does not exist.

Name	SSN	Address	PO Box Applicant and Date	Date UI Claim Filed	UI \$ Paid	Potential Loss	Time Period of UI Payments	Chase Acct #	Fictitious UI Claim in NM?
Fede, Phil	7538	PO Box 18604 Denver, CO 80218	Christine Ortega 07/12/11	7/25/2011	19,068.00	20,884.00	8/6/11 - 5/20/12	3786	No
Mares, Joe *	3583	PO Box 18801 Denver, CO 80218	Gerald Archuleta 07/12/11	7/26/2011	18,160.00	20,884.00	08/06/11 - 5/13/12	6696	No
Trujillo, Desiray	9990	c/o G. Archuleta PO Box 611 to PO Box 1308 Pagosa Springs, CO 81147 chg 3/21/12		8/24/2011	17,252.00	20,884.00	09/03/11 - 6/17/12	9452	No
McGinn, Damon	3800	PO Box 11695 to PO Box 10439 Denver, CO 80211 chg 2/6/12	Christine Ortega 07/12/11	7/26/2011	18,160.00	20,884.00	08/06/11 - 5/13/12	6731	No
Padilla, Ashley	9898	c/o Chris Ortega to Chris Cardenas PO Box 48134 Denver, CO 80204 chg 3/16/12	Christine Ortega 07/12/11	8/9/2011	19,976.00	20,884.00	08/20/11 - 7/6/12	3887	No
Flores, Ronnie	1680	PO Box 40962 to PO Box 44287 Denver, CO 80204 chg 2/6/12	Gerald Archuleta 07/12/11	7/26/2011	18,160.00	20,884.00	08/06/11 - 5/13/12	6797	Yes, employee of Lonnie Petry
Allen, Megan	4726	PO Box 11492 to PO Box 328 Denver, CO 80211 chg 2/27/12	Christina Cardenas 07/12/11	8/9/2011	18,614.00	20,884.00	08/20/11 - 6/17/12	4159	No
Martinez, Kevin	7312	c/o Daniel Johnson PO Box 40945 to PO Box 693 Pagosa Springs, CO chg 9/16/11	Christina Cardenas 07/12/11	8/8/2011	21,500.00	23,000.00	08/20/11 - 6/17/12	4960	No
Trujillo, Anthony	5477	PO Box 11492 to PO Box 79 Denver, CO 80211 chg 2/23/12	Christina Cardenas 07/12/11	8/9/2011	17,252.00	20,884.00	08/20/11 - 5/13/12	4351	No
* Joe Mares/27-5913 has been identified as a fictitious employer in NM.					\$168,142.00	\$190,072.00			

GOVERNMENT
EXHIBIT
1(b)

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[illegible]

FICTITIOUS UI CLAIMS FILED IN COLORADO

Employer/Mailing Address: Mike Brimer DBA A To Z Equipment, PO Box 43, Embudo, NM 87531

PO Box 43 is the address of TX employer Dallas Biological Discovery & Research & CO UI claimants Travis Casey and Tyler Kowalczyk.

Reported Physical Location & Phone: 7502 E. 36th Ave., Denver, CO 80238, 303-921-6459

7502 E. 36th Ave. does not exist.

Name	SSN	Address	Comment Re Address	Date UI Claim Filed	UI \$ Paid	Potential Loss	Time Period of UI Payments	Chase Acct #	Fictitious UI Claim in NM?
Montoya, Arnold	3663	c/o Chris O. to Cindy Roswent PO Box 623 to PO Box 1505 Pagosa Springs, CO 81147 chg 1/6/12		6/6/2011	19,710.00	20,148.00	6/18/11 - 5/20/12	2570	No
Fede, Chris	1367	c/o G. Archuleta PO Box 6231 to PO Box 392 Santa Fe, NM 87504 chg 5/7/12	same address of NM fictitious employers Don Haffner & Timothy Sisneros and TX UI clmnt Jim Thorpe	6/2/2011	20,832.00	25,606.00	06/18/11 - 5/20/12	9824	No
Larranaga, Steve	1551	c/o M. Espinoza, PO Box 2403 to PO Box 782 Española, NM 87532 chg 5/7/12	Same address of NM UI clmnts Timothy Sisneros & Alyssa Osegueda	6/2/2011	21,360.00	26,255.00	06/18/11 - 5/20/12	0272	No
Petry, Lonnie *	9281	c/o C. Cardenas to c/o Vanessa Rios PO Box 613 to PO Box 817 Pagosa Springs, CO 81147 chg 5/22/12		6/6/2011	20,492.00	25,724.00	06/18/11 - 5/20/12	2566	No
* Lonnie Petry/27-3581 has been identified as a fictitious employer in NM.					\$82,394.00	\$97,733.00			

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FICTITIOUS UI CLAIMS FILED IN COLORADO

Employer/Mailing Address: Carlos Roybal DBA Zia Computers, PO Box 613, Pagosa Springs, CO 81147

PO Box 613 is the address of CO UI claimants Jesse Treadway and Lonnie Petry.

Carlos Roybal/27-2507 has been identified as a fictitious employer in NM.

Reported Physical Location & Phone: 3562 Causeway Dr., Pagosa Springs, CO 81147, 970-582-0205

Name	SSN	Address	PO Box Applicant & Date/Comment	Date UI Claim Filed	UI \$ Paid	Potential Loss	Time Period of UI Payments	Chase Acct #	Fictitious UI Claim in NM?
Marquez, Jesse	8082	c/o Chris Ortega to Margret Vincent PO Box 623 Pagosa Springs, CO 81147 chg 9/25/11		9/16/2011	4,086.00	11,804.00	10/01/11 - 11/27/11	5525	No
Trujillo, Alfred	8808	c/o Charles Diaz to Sally Wright PO Box 5845 to PO Box 41207 Santa Fe to Albuquerque, NM 87502 87101 chg 12/2/11	same address of NM fictitious employers Julian Candelaria & Kevin Smith and TX UI clmnt Chris Blea	9/16/2011	4,994.00	11,804.00	10/01/11 - 12/11/11	5539	No
Martinez, Eric	2777	c/o Chris Cardenas to Sandy Lomas PO Box 11492 Denver, CO 80211 chg 10/21/11	Christina Cardenas 07/12/11	9/16/2011	4,086.00	11,405.00	10/01/11 - 11/27/11	5558	No
Marquez, Donna	2197	PO Box 11493 to PO Box 192 Denver, CO 80211 chg 3/22/12	Jacob Roybal 10/01/11	10/3/2011	2,270.00	6,992.00	10/15/11 - 11/12/11	8605	No
Martinez, Chris	8545	c/o Gerald Archuleta to Stew Applebee PO Box 611 to PO Box 14 Pagosa Springs, CO 81147 chg 10/21/11		9/16/2011	4,086.00	11,804.00	10/01/11 - 11/27/11	5999	No
Martinez, Eli	-9347	c/o Michelle Espinoza to Vickie Romero PO Box 242 to PO Box 91 Alcalde, NM 85711 chg 12/2/11	same address of TX UI clmnt Janeth Honey	9/16/2011	4,086.00	11,804.00	10/01/11 - 11/27/11	6005	No

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[illegible]

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[illegible]

[illegible]

Employer/Mailing Address:	Ralph Sanchez DBA Demlab Co-op, PO Box 554, Santa Fe, NM 87504
Reported Physical Location & Phone:	2431 S. Bend Rd, Denver, CO 80204, 682-300-0995

Name	SSN	Address	& Date/Comment	Claim Filed	Loss	of UI Payments	Acct #	Claim in NM?
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Medrano, Margare	7272	PO Box 40442, Denver, CO 80204
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4/27/2012

0.00	13,000.00
0.00	13,000.00

13,000.00
13,000.00

Time Period
of UI Payments

Chase
Acct #

Fictitious UI
Claim in NM?

Company Name/Employer

	Alleged Co Owner
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UI \$ Paid	
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Potential

1000

\$505,515.00

\$663,305.00

[illegible]

[illegible]

Employer/Mailing Address: Southwest Design Studios, PO Box 1356, Alcalde, NM 87511		Fed ID [REDACTED] 8951							
Reported Physical Location & Phone: CR 43, Gate 15, Alcalde, NM 87511, 505-982-2137									
Business started on 1/1/09; first wages paid 1/17/09									
Owner: Mike Brimer, ss [REDACTED] 7878; Brimer employed by J&P Plumbing from 3rd quarter of 2002-4th quarter of 2003									
		PO Box Applicant	Date UI Claim Filed	Maximum	UI \$ Paid				
Name	SSN	Address	Claim Filed or Re-Filed to Re-Open Claim	Benefits Allowed		Misc Info	Card Issuer		
		physical: [REDACTED] Abiquiu, NM 87510 mailing: PO Box 244, Santa Cruz, NM 87567	Gerald Archuleta 9/24/09	\$10,478.00	\$0.00	Did not pass SS # verification benefits denied	n/a		
Smith, Bill	[REDACTED] 1479	Santa Cruz, NM 87567	Gerald Archuleta 9/24/09	\$10,478.00	\$0.00	Did not pass SS # verification benefits denied	n/a		
		physical: [REDACTED] Velarde, NM 87582 mailing address: PO box 244, Santa Cruz, NM 87567	Gerald Archuleta 9/24/09	\$10,478.00	\$0.00	Did not pass SS # verification benefits denied	n/a		
Martinez, David	[REDACTED] 1793	Santa Cruz, NM 87567	Gerald Archuleta 9/24/09	\$10,478.00	\$0.00	Did not pass SS # verification benefits denied	n/a		
		physical: [REDACTED] Alcalde, NM 87511 mailing address: PO box 244, Santa Cruz, NM 87567	Gerald Archuleta 9/24/09	\$10,478.00	\$0.00	Did not pass SS # verification benefits denied	n/a		
Phillips, Edward	[REDACTED] 3272	Santa Cruz, NM 87567	Gerald Archuleta 9/24/09	\$10,478.00	\$0.00	Did not pass SS # verification benefits denied	n/a		
		physical: [REDACTED] Alcalde, NM 87511 mailing address: PO Box 244, Santa Cruz, NM 87567	Gerald Archuleta 9/24/09	\$10,478.00	\$0.00	Did not pass SS # verification benefits denied	n/a		
Lujan, Mike	[REDACTED] 6239	Santa Cruz, NM 87567	Gerald Archuleta 9/24/09	\$10,478.00	\$0.00	Did not pass SS # verification benefits denied	n/a		
Total				\$41,912.00	\$0.00				

[illegible]

Employer/Mailing Address: Enchanted Speciality Services, PO box 83, Embudo, NM 874		Fed ID # 9751							
Reported Physical Location & Phone: CR 156 House 74, Abiquiu, NM 87510, 505-753-1172									
Business started on 2/2/09; first wages paid 2/16/09									
Owner: Travis Casey, ssn [REDACTED] 2689; Casey employed by J&P Plumbing 3rd quarter 2004-2nd quarter of 2005									
		PO Box Applicant	Date UI Claim Filed	Maximum	UI \$ Paid	Card Issuer			
Name	SSN	Address	and Date	Claim Filed or Re-Filed to Re-Open Claim	Benefits Allowed	Misc Info			
Ortega, Christine	[REDACTED] 0852	physical [REDACTED] Abiquiu, NM 87510 mailing: PO Box 1322, Abiquiu, NM 87510	Jacob Roybal 1/6/10	2/7/2010; 8/22/2010	\$19,596.00	\$12,177.00	9/3/10 benefits suspended	BA & WF	
Quintana, Antonette	[REDACTED] 0860	physical: [REDACTED] Abiquiu, NM 87510 mailing: PO Box 1322, Abiquiu, NM 87510	Jacob Roybal 1/6/10	1/24/2010; 8/1/2010	\$19,596.00	\$13,530.00	9/3/10 benefits suspended	BA & WF	
Archuleta, Naicisco	[REDACTED] 4676	physical: [REDACTED] Abiquiu, NM 87510 mailing: PO Box 1322, Abiquiu, NM 87510	Jacob Roybal 1/6/10	1/24/2010	\$11,076.00	\$0.00	Did NOT pass SS# validation benefits denied	n/a	
Medina, Jerome	[REDACTED] 7667	physical: [REDACTED] Abiquiu, NM 87510 mailing: PO Box 1322, Abiquiu, NM 87510	Jacob Roybal 1/6/10	1/24/2010; 8/1/2010	\$19,596.00	\$13,530.00	9/3/10 benefits suspended	WF	
Total					\$69,864.00	\$39,237.00			

Employer/Mailing Address: Rio Grande Tech Services, PO Box 1356, Alcalde, NM 87511		Fed ID [REDACTED] 0879					
Reported Physical Location & Phone: CR 34, House 12, Alcalde, NM 87511, 505-990-8229							
Business started on 1/1/09							
Owner: Adam Romero, ssn [REDACTED] 8497; Romero employed by J&P Plumbing 3rd quarter of 2007							
		PO Box Applicant	Date UI Claim Filed	Maximum	UI \$ Paid		Card Issuer
Name	SSN	Address	Claim Filed or Re-Filed to Re-Open Claim	Benefits Allowed		Misc Info	
Roybal, Jacob	[REDACTED] 2363	physical: [REDACTED] Abiquiu, NM 87510 mailing: PO box 244, Santa Cruz, NM 87567	Gerald Archuleta 9/24/09	11/1/2009; 5/16/2010	\$18,538.00	\$16,692.00	8/13/10 suspended BA
Dominguez, Javier	[REDACTED] 1617	physical: [REDACTED] Abiquiu, NM 87510 mailing: PO Box 244, Santa Cruz, NM 87567	Gerald Archuleta 9/24/09	5/9/2010; 11/1/2009	\$18,538.00	\$16,692.00	8/13/10 suspended BA
Archuleta, Edwin	[REDACTED] 1810	physical: [REDACTED] Abiquiu, NM 87510 mailing: PO Box 244, Santa Cruz, NM 87567	Gerald Archuleta 9/24/09	11/1/2009; 5/16/2010	\$18,538.00	\$16,692.00	8/13/10 suspended BA
Total					\$55,614.00	\$50,076.00	

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Lopez, Jessica	██████████-4854	physical: ██████████ Abiquiu, NM 87510 mailing: PO Box 129, Embudo, NM 87531	Christina Gonzales 8/18/10	8/15/2010	\$9,880.00	\$1,900.00	10/1/10 suspended	WF
Herrera, Amanda	██████████-8805	Physical: PO Box 70 Hernandez, NM 87537 mailing: PO Box 70 Hernandez, NM 87537 physical: ██████████ Abiquiu, NM 87510 mailing: PO Box 128, Embudo, NM 87531	n/a	5/28/2006	\$0.00	\$0.00	Did NOT file for UI benefits	n/a
Martinez, Steven	██████████-0146	physical: ██████████ Abiquiu, NM 87510 mailing: PO Box 128, Embudo, NM 87531	Christine Ortega 8/18/10	8/15/2010	\$9,880.00	\$1,900.00	10/1/10 suspended	WF
Kowalczyk, Tyler	██████████-6395	physical: ██████████ Abiquiu, NM 87510 mailing: PO Box 129, Embudo, NM 87531	Christina Gonzales 8/18/10	8/15/2010	\$9,880.00	\$1,900.00	10/1/10 suspended	WF
Martinez, Leon	██████████-4432	physical: ██████████ Abiquiu, NM 87510 mailing: PO Box 128, Embudo, NM 87531	Christine Ortega 8/18/10	8/15/2010	\$9,880.00	\$1,900.00	10/1/10 suspended	WF
Total					\$103,480.00	\$17,860.00		

Employer/Mailing Address: MJ Janitorial Services, Julian Candelaria, PO Box 5845, Santa Fe, NM 87502				Fed ID # [REDACTED] 4546				
Reported Physical Location & Phone: 98 Calle De Lorcía, Santa Fe, NM 87507, 505-475-3321								
Business started on 1/11/10 first wages paid 1/18/10								
Owner: Julian Candelaria, ssn [REDACTED] 0070; Candelaria employed by J&P Plumbing 3rd quarter 2000-3rd quarter 2002								
Name	SSN	Address	PO Box Applicant and Date	Date UI Claim Filed	Maximum	UI \$ Paid	Card Issuer	
Casey, Lila	[REDACTED] 1939	physical: [REDACTED] Santa Fe, NM 87505 mailing: PO Box 23631, Santa Fe, NM 87502	Christine Ortega 10/7/10	Claim Filed or Re-Filed to Re-Open Claim	Benefits Allowed		Misc Info	
				10/24/2010				\$8,970.00
Garcia, Joe	[REDACTED] 7343	physical: [REDACTED] Santa Fe, NM 87502 mailing: PO Box 23631, Santa Fe, NM 87502	Christine Ortega 10/7/10	11/7/2010	\$9,542.00	\$4,037.00	stopped certifying	WF
Ward, Leala	[REDACTED] 8028	physical: [REDACTED] Santa Fe, NM 87507 mailing: PO Box 23952, Santa Fe, NM 87502	Christina Cardenas 10/7/10	11/7/2010	\$8,866.00	\$3,751.00	stopped certifying	WF
Soveranes, Elias	[REDACTED] 5000	physical: [REDACTED] Santa Fe, NM 87507 mailing: PO Box 23952, Santa Fe, NM 87502	Christina Cardenas 10/7/10	10/24/2010	\$9,100.00	\$0.00	n/a	
Espinoza, Lisa Marie	[REDACTED] 2838	physical: [REDACTED] Santa Fe, NM 87502 mailing: PO Box 23952, Santa Fe, NM 87502	Christina Cardenas 10/7/10	11/21/2010	\$8,814.00	\$3,390.00	stopped certifying	WF
Perez, Larry	[REDACTED] -5000	Two claims found under name: 1574879377 & 29038332	n/a	5/1/2011 & 3/7/2010; 9/26/2010	\$14,950.00	\$7,898.00	Did NOT pass SS# validation benefits denied	n/a
Total					\$60,242.00	\$23,906.00		

[illegible]

Company Name	Intended Loss	Actual Loss
New Frontier Landscaping	\$60,646.00	\$57,088.00
Southwest Design Studios	\$41,912.00	\$0.00
Zia Computer	\$54,453.00	\$41,088.00
Enchanted Specialty Services	\$69,864.00	\$39,237.00
Zia Framing	\$29,632.00	\$12,498.00
Rio Grande Tech Services	\$55,614.00	\$50,076.00
Zia Marketing	\$103,480.00	\$17,860.00
MJ Janitorial Services	\$60,242.00	\$23,906.00
Northern NM Delivery	\$70,252.00	\$6,176.00
Fun Box Toys	\$27,352.00	\$0.00
Santa Fe Computer Diagnostic	\$0.00	\$0.00
Total	\$573,447.00	\$247,929.00

Initial TWB Date 3/11/2015

Page 2 of 3

6. On May 22, 2012, Department of Labor-Office of the Inspector General Special Agents interviewed Christine Ortega. Ortega is Cardenas' roommate. Ortega advised Archuleta and Gonzales came to her residence and asked her if she wanted to make \$50.00 for opening PO Boxes. She also traveled with them to Colorado, Texas and New Mexico and opened a total of twelve (12) PO Boxes using the personal identifying information of twenty (21) victims.

7. On May 22, 2012, a United States Postal Inspector and a Special Agent with the Department of Labor-Office of the Inspector General interviewed Jacob Roybal. Roybal advised Archuleta and Gonzales offered him \$100.00 to open PO Boxes. Roybal traveled with them to Colorado and New Mexico and opened a total of five (5) PO Boxes using the personal identifying information of thirteen (13) victims.

8. After taking into account the seven (7) PO Boxes Archuleta opened using twenty-two (22) different victim names and personal identifying information, the twenty-nine (29) PO Boxes Cardenas, Ortega and Roybal opened using fifty-six (56) victim names and personal identifying information, I was able to calculate an actual loss amount attributed to Archuleta.

9. Archuleta is responsible for at least \$719,858.73¹ in actual loss. The actual loss attributed to Archuleta is based on the UI payments withdrawn from the issued debit cards. The PO Boxes opened by Archuleta or opened at his direction received the UI debit cards. Once that money was withdrawn from those debit cards, it resulted in the above actual loss amount.

10. The spreadsheet I prepared to document Archuleta's restitution amount is attached as Exhibit 1.

¹ Colorado Department of Labor and Employment underreported the loss amount for McReynolds Consulting employee Philip Gomez by \$15,120 and for West Colorado Textile employee Ronnie Flores by \$1,846. This would adjust Archuleta's actual loss amount to \$734,978.73.



UNITED STATES POSTAL INSPECTION SERVICE

FORT WORTH DIVISION

STATE OF Texas) SS
 COUNTY OF Dallas) SS
 CITY OF Dallas) SS

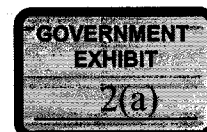
PAGE 1 OF 3 PAGES

Criminal No. 14-cr-922JB

**USA v. Jasonn Gonzales and Gerald
 Archuleta-District of New Mexico**

My name is Thomas W. Brown. My current employer is the United States Postal Inspection Service and my job title is Postal Inspector.

1. On or about September 12, 2014, I prepared the attached spreadsheet documenting the actual and intended loss amounts defendant Gerald Archuleta is held accountable.
2. These figures were compiled from source data including the New Mexico Department of Workforce Solutions, the Texas Workforce Commission, the Colorado Department of Labor and Employment and various bank and debit card transaction histories.
3. The spreadsheet includes seven (7) Post Office Boxes (PO Boxes) Archuleta opened that included twenty-two (22) different victim names and personal identifying information used to open the PO Boxes.
4. Also included in the spreadsheet are PO Boxes opened by persons Archuleta and Gonzales recruited in order to continue and to advance the Unemployment Insurance (UI) scheme.
5. On May 22, 2012, Department of Labor-Office of the Inspector General Special Agents interviewed Christina Cardenas. Cardenas stated Archuleta is her half-brother. She stated Archuleta and Gonzales approached her and asked if she wanted to open PO Boxes in exchange for \$50.00 for every PO Box she opened. She also traveled with Archuleta and Gonzales to Texas, Colorado and New Mexico and opened a total of twelve (12) PO Boxes using the personal identifying information of twenty (22) victims.



Employer/Mailing Address: Dallas Biological Discovery & Research, Armando Garcia, PO Box 43, Embudo, NM 875

TWC Acct # [REDACTED]	0399; Fed ID	8689
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Reported Physical Location & Phone: 1527 Industrial Rd., Arlington, TX 76007, 682-300-0995
1527 Industrial Rd., Arlington, TX 76007 does not exist.

prev phone # 817-433-8907

Page 2 of 3

FICTITIOUS UI CLAIMS FILED IN TEXAS										
<p>Employer/Mailing Address: Arlington Computer Tech, % Louis Lujan, PO Box 182724, Arlington, TX 76096; Christina Cardenas applied for PO Box 182724 on 12/13/11.</p> <p>Reported Physical Location & Phone: 1204 Riverview Cir, Arlington, TX 76096, 214-287-1164 1204 Riverview Cir does not exist.</p>										
Name	SSN	Address	PO Box Applicant and Date	Date UI Claim Filed	Maximum Benefits Allowed	UI \$ Paid	Less UI \$ Recouped	Time Period of UI Payments BWE-BWE	Misc Info	Chase EDA Acct #
Jacobson, Gary	0622	PO Box 182813 Arlington, TX 76096	Christine Ortega 12/13/11	12/25/2011	\$7,823.00	\$4,485.00	\$6.00	12/31/11- 3/10/12	3/11/12 claim stopped due to NH notice from Wallace Theater Corp	8140
Melara, Elio	7817	PO Box 2264 Arlington, TX 76004	Christina Cardenas 12/13/11	12/25/2011	\$7,642.00	\$5,112.00	\$52.50	12/31/11-3/17/12	3/18/12 claim stopped due to no contact to cert on hold	3947
Ojada, Raul	3498	PO Box 454 Arlington, TX 76004	Christine Ortega 12/13/11	12/25/2011	\$7,635.00	\$5,538.00	\$16.17	12/31/11-5/12/12	ineligible from 3/4/12-4/21/12 due to failure to respond to Profiling letter	1618
Cavanaugh, Brett	4966	PO Box 300953 Arlington, TX 76007	Christine Ortega 12/13/11	1/8/2012	\$9,314.00	\$5,538.00	\$441.00	1/14/12-4/21/12	4/22/12 claim stopped due to no contact to cert on hold	9695
Montoya, Michael	9111	PO Box 301252 Arlington, TX 76007	Christina Cardenas 12/13/11	12/25/2011	\$7,671.00	\$7,671.00	\$11.00	12/31/11-5/5/12		9353
Martinez, Matthew	4074	PO Box 151051 Arlington, TX 76015	Christina Cardenas 12/13/11	12/25/2011	\$7,729.00	\$6,390.00	\$427.00	12/31/11-4/21/12	4/29/12 claim stopped due to no contact to cert on hold	9351
Rico, Juliet	2491	PO Box 151072 Arlington, TX 76015	Christine Ortega 12/13/11	1/8/2012	\$9,313.00	2,556.00	\$7.50	1/14/12-2/18/12	2/19/12 claim stopped due to no contact to cert on hold	
TOTAL					\$57,127.00	\$37,290.00	\$961.17			



Initial TWB Date 3/11/2015

Page 2 of 3

I have read the affidavit consisting of 3 pages. This affidavit is true and correct to the best of my knowledge.

SIGNED:  3/11/2015

PRINTED NAME: T.W. Brown

Subscribed and sworn to before me on this 11th day of March, 2015, at Dallas County, Dallas, Texas (39 USC 1010).

WITNESSED: 

Title: Special Agent, DOL-OIG

PRINTED NAME: David Wickersham 3/11/15

